
Appendix A

Analysis of Scoping Comments

Brushy Fork Face Road Decommissioning Project

Three letters specific to the project were received during the scoping period of March 24, 2017 to April 24, 2017. The letters were analyzed and an analysis code assigned to the comments (see Table below).

Comment Analysis Codes

- 1: Outside the scope of the proposed action.
- 2: Already decided by law, regulation, Forest Plan, or other higher level of decision.
- 3: Irrelevant to the decision to be made.
- 4: Conjectural and not supported by scientific evidence.
- 5: General comment, suggestion, opinion, or position statement.
- 6: Other agency or partner's consultation, review, advice, recommendation(s), etc.
- 7: Already considered in the proposed action or is standard procedure.
- 8: Will be included in an analysis of effects to the environment.

Codes 1 – 6 are standard codes. Comments assigned to these codes are considered to be non-significant issues. Code 7 was added as a category for those suggestions that are already proposed or for procedures that are routinely done. Code 8 was added as a category for suggestions that will be analyzed for effects to the environment.

Table: Comment Analysis

Commenter	Comment	Disposition
Friends of the Clearwater, Gary Macfarlane	The [FS] needs to publish the monitoring results of past similar projects to [show] that negative impacts truly fit within a CE. We are concerned that this proposal might not fit with an EA, given the size of this project.	See Response 1 below. The proposed activities fall within the category of actions - 36 CFR 220.6(e) (20) - excluded from documentation in an Environmental Assessment or Environmental Impact Statement.
	[The proposal], though intended to reduce erosion, may cause more erosion. We suggest...removal of all culverts and recontouring the immediate area of the culverts ... and a less aggressive vegetation removal option, which would recontour only areas of the roads where erosion is taking place. Such options would best be considered and evaluated in an EA.	See Response 2 below.
	Removal of non-system roads, though important, does [not] address the issue of too many system roads [per] agency regulations to come up with a minimum road system. The number of these...projects would not be needed if the agency truly adopted a minimum road system and then removed barriers on roads that would be decommissioned.	Because the roads are non-system roads, they are not included in the CNF travel planning efforts, and therefore the issue is outside the scope of the proposed action.

Commenter	Comment	Disposition
<p>Friends of the Clearwater, Gary Macfarlane</p>	<p>We assume it would be done with mitigation money from the lower Snake River dams. It cannot be used to justify timber harvesting on section 8 and 10 in the future, based upon some future finding the watershed meets forest plan standards.</p>	<p>The focus of the project is to restore degraded conditions resulting from high densities of non-system roads no longer needed for Forest Management. The Forest does not have current plans for harvest in these sections; however, future timber harvests are likely since the project area is designated as a timber management area (MA 1) in the CNF Forest Plan. Any future timber harvests will be analyzed for impacts based solely on the proposed actions at the time; past watershed restoration activities will not be used to offset the impacts of or justify any proposed harvests.</p>
<p>Idaho Conservation League, Brad Smith</p>	<p>The Idaho Conservation League generally supports this project.</p>	<p>Thank you for your comment.</p>
	<p>However, the scoping notice indicates “an opening at the top of the road cut-slope would be left to allow foot access” to each of the identified road segments. Unless there is a trail, campsite, or other noteworthy feature where foot access is warranted, ICL would discourage this practice. It has the potential to invite illegal off-road vehicle traffic, invasive weeds and erosion.</p>	<p>From past comments, we learned that the public found the natural mulch from the removed trees and brush along the recontoured surface was too thick for easy walking. In response, an area at the top of the recontoured surface was left free of mulch/slash to allow for easier foot travel.</p> <p>The Brushy Fork drainage and the land around Forest Road 5669 is a popular hunting area in the fall. Providing an (approx.) 18-inch path at the top of the recontoured roads free of mulch and slash ensures restoration does not preclude hunters or others from recreating in the area. Although monitoring has not found an increase in erosion as a result of leaving the narrow footpath, encroachment by invasive plants has increased in areas receiving higher public use. As stated in the scoping letter, the roads will be treated for invasive plants before decommissioning, and will be monitored for weed infestations and treated accordingly.</p>
<p>Rod Parks</p>	<p>Unless the [adjacent] private landowner is willing to do the same decommissioning,</p> <p>the results from decommissioning the public sections will not produce results versus cost of piecemeal decommissioning.</p>	<p>The issue is outside the scope of the proposed action.</p> <p>Per the Forest Plan, the Forest is directed to “Rehabilitate and/or mitigate the adverse effects of fire, flood, and other natural or management related causes.” (CNF Forest Plan, p. III-70). The proposed project helps meet this Forest Plan direction.</p>

Commenter	Comment	Disposition
Rod Parks	Another concern is the private landowner requesting permission to access their land for timber harvest and building temporary roads to access their land in the future.	The issue is outside the scope of the proposed action.
	While there may be landslides during major storm events without decommissioning, there can be no guarantee similar events may produce similar results after decommissioning, especially for the first few years.	See Response 3 below.
	The plan to leave a 2 [ft.] area to accommodate foot and wildlife appears to be making a trail, but not calling it a trail ... The existing roads make a much better corridor for wildlife and foot traffic.	See Response to ICL above.
	Have the streams been monitored for sediment before this project?	Monitoring of sediment in the smaller tributary streams in the project area has not been conducted. However, habitat surveys assessing cobble embeddedness (a measure of sediment) in Brushy Fork and the reaches directly below the project area found a CE mean of 11%, which is considered low (Clearwater BioStudies, 1994).
	What is the estimated time in years before there will be reduced sediment after the disturbance of decommissioning if the project is completed?	Ten years of monitoring data on the Forest show that clump planting native vegetation on the recontoured slopes, pulling duff and organic material from the adjacent uphill side to enhance revegetation, and scattering the removed vegetation (slash) on the recontoured surface as a natural mulch result in minimal to no surface erosion along the recontoured road surface, and no rilling or erosion into stream channels. (NP-CNF Annual Monitoring Reports: 1999-2009)

Forest Service Responses

Response 1: Road decommissioning methods used on the Forest, including monitoring and feedback to incorporate best available practices, are based on an established program used since the mid-1990s. A summary of the methods, annual accomplishments and monitoring (1999 – 2009) can be found in the 1992 - 2009 Clearwater National Forest Annual Monitoring Reports, available at <http://www.fs.usda.gov/detail/nezperceclearwater/landmanagement/planning>.

Response 2: The purpose of this project is to reduce adverse impacts to the watershed from roads determined no longer necessary for the Forest's transportation system. The project is part of an on-going large scale integrated restoration efforts in the Lochsawatershed. By decommissioning and restoring these non-system roads to their expected ecological conditions, the project will help meet Clearwater National Forest Plan objectives and management direction for wildlife and fish habitat, soil productivity, water quality, and protecting and improving watershed, wetland, and riparian resources.

Peer-reviewed research (Lloyd *et al* 2013, Foltz *et al* 2009, Foltz *et al* 2007, Madej 2001, and Luce 1997) found that treatments such as decompaction or abandonment, even on revegetated roads, without removing the road prism along with treating stream crossings have reduced soil and vegetative productivity

compared to fully recontoured roads. In a study on the effectiveness of road abandonment vs. road recontouring on the Clearwater National Forest, Lloyd et al. (2013) concluded that road recontouring, as proposed in this project, significantly increases the recovery of the road's forested/ecological condition when compared to allowing recovery to occur naturally over time. Specifically Lloyd states that "[R]esource managers often use restoration of aboveground vegetation structure as the criterion for restoration success. In our study, the trajectory of plant succession on abandoned roads and recontoured roads followed similar trends to other research conducted on passively restored roads, although our data suggest that vegetation succession to shrubs and trees may be slower on abandoned roads as compared with recontoured roads. However, ecosystem recovery belowground differed markedly from that aboveground ... [O]ur study showed that recontouring increased [Soil Organic Matter], [Total Carbon], and [Total Nitrogen] pools to levels similar to those of never-roaded sites, while TC and TN pools remained low along abandoned roads. Soil organic matter is a key ecosystem property that exerts control on secondary succession, water-holding capacity, hydraulic properties, and nutrient dynamics. Research quantifying accumulation rates of SOM following disturbance indicates that it can take thousands of years for SOM to accumulate to steady-state levels, particularly in forested ecosystems. In this context, our research suggests that active recontouring can dramatically accelerate the recovery of soil properties by hundreds to thousands of years, as compared with never-roaded reference areas. In contrast, belowground properties and processes along abandoned roads remain in a degraded state even 30 or more years after road closure and revegetation."

Response 3: Research completed after the 1995-1996 landslide event (McClelland et al 1997) determined that abandoned, over-grown roads had the highest incidence of mass failures compared to other forest land uses (e.g., timber harvest, fire, or drivable/maintained roads). Roads recontoured prior to the 1995-96 event had no mass failures (ibid). Though the proposed decommissioning will have short-term impacts, including erosion, the project will have benefits to the watershed over the long term. The recontoured roads will have a lower risk and incidence of erosion and higher above- and belowground productivity and carbon storage compared to their current conditions.

Clearwater BioStudies, Inc. 1994. Habitat Conditions and Salmonid Abundance in Brushy Fork Creek, Powell Ranger District, Summer 1993. Prepared for the US Forest Service, Clearwater National Forest, Orofino, ID. Contract No. 53-0276-3-15

Lloyd R.A., Lohse K.A., and Ferré. 2013. Influence of road reclamation techniques on forest ecosystem recovery. *Frontiers in Ecology and Environment*, Vol. 11(2): 75–81.

Foltz, R.B., Copeland, N.S. and Elliot, W.J., 2009. Reopening abandoned forest roads in northern Idaho, USA: Quantification of runoff, sediment concentration, infiltration, and interrill erosion parameters. *Journal of Environmental Management*, 90(8), pp.2542-2550.

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Madej, M., 2001. Erosion and sediment delivery following removal of forest roads. *Earth Surface Processes and Landforms*.26(2), pp. 175–190.[http://onlinelibrary.wiley.com/doi/10.1002/1096-9837\(200102\)26:2%3C175::AID-ESP174%3E3.0.CO;2-N/full](http://onlinelibrary.wiley.com/doi/10.1002/1096-9837(200102)26:2%3C175::AID-ESP174%3E3.0.CO;2-N/full)